

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KIMBRA CRISWELL,	)	
	)	
Plaintiff,	)	
v.	)	C.A. No. 05-CV-00321 GMS
	)	
LYDIA ADAIR MCFADDEN and CHRISTIANA	)	
CARE HEALTH SERVICES, INC.,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**VERDICT FORM**

1. Do you find that Defendant Lydia Adair McFadden was negligent?

☐ YES ☐ NO

If you answered no, call the Bailiff.

If you answered yes, proceed to number 2.

2. Do you find that Defendant Lydia Adair McFadden's negligence was a proximate cause of injury to Ms. Criswell?

☐ YES ☐ NO

If you answered no, call the Bailiff.

If you answered yes, proceed to number 3.

3. Do you find that Plaintiff Kimbra Criswell was contributorily negligent?

☐ YES ☐ NO

If you answered no, proceed to number 6.

If you answered yes, proceed to number 4.

4. Do you find that Plaintiff Kimbra Criswell's negligence was a proximate cause of her own injury?

☐ YES ☐ NO

If you answered no, proceed to number 6.

If you answered yes, proceed to number 5.

5. Apportion the amount of negligence among the parties that you have found to have been negligent. If you find that a party was not negligent or that its negligence did not proximately cause the injury, that party must be assigned 0%. The assigned percentages must total 100%.

Lydia Adair McFadden \_\_\_\_\_ %

Kimbra Criswell \_\_\_\_\_ %

Total 100 %

If you answered "NO" to Question 3 or Question 4, Plaintiff's percentage should be zero.

If Ms. Criswell's portion of negligence is greater than 50%, call the Bailiff. If you find that Ms. Criswell's negligence is 50% or less, please go to question 6.

6. State the full amount of your award of damages to Ms. Criswell. Do not reduce your award by the amount of her negligence, if you have found her to be negligent. The Court will calculate the reduction if it applies.

\$ \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_(Foreperson)